

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

MRI SOFTWARE, LLC,)	CASE NO. 1:12-cv-01082-CAB
)	
Plaintiff,)	JUDGE Christopher A. Boyko
)	
v.)	
)	
LYNX SYSTEMS, INC.,)	
)	
DONALD ROBINSON,)	
)	
Defendants.		

JOINT PROPOSED DISPOSITIVE MOTION BRIEFING PLAN

Pursuant to the Court's March 3, 2016 Order, the parties submit this Joint Proposed Dispositive Motion Briefing Plan. The Amended Complaint and Counterclaims in this action encompass a total of forty separate causes of action. Fact discovery in the case has spanned several years. To identify and discuss the numerous causes of actions and issues in the case, the parties respectfully propose two alternative briefing plans for the Court's consideration:

Alternative A:

June 24, 2016: Each side may file up to two summary judgment motions supported by briefs of no more than 25 pages each;

August 5, 2016: Responsive briefs, limited to 25 pages each

August 26, 2016: Reply briefs, limited 20 pages each

Alternative B:

June 24, 2016: Each side may file one summary judgment brief of no more than 45 pages;

August 5, 2016: Responsive brief, limited to 45 pages

August 26, 2016: Reply brief, limited 25 pages

March 9, 2016

Respectfully submitted,

/s/ Georgia K.E. Yanchar

Daniel J. McMullen (Ohio Bar No. 0034380)

Georgia K.E. Yanchar (0071458)

CALFEE, HALTER & GRISWOLD LLP

1405 East Sixth Street

Cleveland, OH 44114

(216) 622-8233 / (216) 241-0816 Fax

gyanchar@calfee.com

Attorneys for Plaintiff, MRI Software, LLC

s/ David T. Movius (by email consent)

David T. Movius (OH 0070132)

MCDONALD HOPKINS LLC

600 Superior Avenue, East, Ste. 2100

Cleveland, Ohio 44114

t 216.348.5400 | f 216.348.5474

dmovius@mcdonaldhopkins.com

and

John T. McLandrich (OH 0021494)

MAZANEC, RASKIN & RYDER CO., L.P.A.

100 Franklin's Row

34305 Solon Road

Cleveland, Ohio 44139

t 440.248.7906 | f 440.248.8861

jmclandrich@mrrlaw.com

Counsel for Lynx Systems, Inc.